

**BEFORE THE  
PUBLIC SERVICE COMMISSION OF SOUTH  
CAROLINA**

**DOCKET NO. 2012-8-E**

IN THE MATTER OF:	)	
	)	<b>PETITION TO INTERVENE</b>
Progress Energy Carolinas, Inc.'s	)	<b>BY NUCOR STEEL –</b>
Integrated Resource Plan (IRP)	)	<b>SOUTH CAROLINA</b>
	)	

Nucor Steel-South Carolina ("Nucor"), a Division of Nucor Corporation, pursuant to Rule 103-825 of the rules and regulations of the South Carolina Public Service Commission ("Commission"), hereby respectfully petitions to intervene in the above-captioned docket. Nucor states the following grounds in support of this petition:

1. Nucor owns and operates a steel production facility near Darlington, South Carolina. As a retail customer of Progress Energy Carolinas, Inc. ("Progress") (formerly known as Carolina Power & Light Company ("CP&L")), Nucor purchases hundreds of millions of kWh of electricity annually at a cost of millions of dollars a year. Since the cost of electricity comprises one of the major costs of Nucor's manufacturing process, electric costs directly affect Nucor's ability to continue to produce steel at a competitive price.
2. This docket has been established to review Progress' 2012 Integrated Resource Plan ("IRP") which, as Progress explains, "reflects current forecasts and management approved changes to resources." IRP at 3. In Order No. 2012-95, the Commission determined that the IRP process constitutes a proceeding under Section 103-804(Q) of the Commission's regulations, and that intervention in these proceedings would be permitted.
3. As a large industrial customer of Progress, Nucor has an interest in the topics addressed in the IRP, including Progress' current long-term energy and demand forecasts as well as Progress' plans to meet its future resource needs. Accordingly, Nucor has a stake in, and will be directly and substantially affected by, the outcome of

this proceeding. Due to the magnitude of its load and its unique service characteristics, Nucor cannot be adequately represented by any other party to this proceeding. Since 1987, Nucor has actively participated in many previous Progress Energy and CP&L fuel and rate proceedings before this Commission. Nucor has not yet determined what its position may be in this proceeding.

4. Nucor's mailing address is:

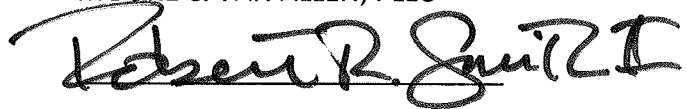
Nucor Steel – South Carolina  
P.O. Box 525  
Darlington, SC 29532

5. Nucor will be represented in this proceeding by the firm Moore & Van Allen, PLLC. Service and correspondence regarding this proceeding should be sent to the undersigned.

WHEREFORE, for the reasons set forth above, Nucor respectfully requests permission to intervene in this proceeding.

Respectfully submitted,

MOORE & VAN ALLEN, PLLC

A handwritten signature in black ink, reading "Robert R. Smith II". The signature is stylized with a large, flowing "R" and "S".

Robert R. Smith II

100 North Tryon Street  
Suite 4700  
Charlotte, North Carolina 28202  
(704) 331-1091  
(704) 378-1975 (fax)  
robsmith@mvalaw.com

Counsel for Nucor Steel – South Carolina

Dated: November 30, 2012

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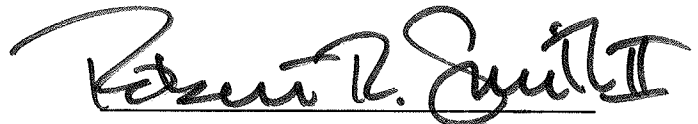
CERTIFICATE OF SERVICE

This is to certify that the foregoing document was served upon the following parties at the addresses set forth by first-class mail, telefax or Federal Express on this the 30<sup>th</sup> day of November, 2012:

Timika Shafeek-Horton, Esq.  
*Progress Energy Carolinas, Inc.*  
550 South Tryon Street, DEC45A  
Charlotte, NC 28202

Jeffrey M. Nelson, Esq.  
*Office of Regulatory Staff*  
1401 Main Street, Suite 900  
Columbia, South Carolina 29201

J. Blanding Holman, Esq.  
Southern Environmental Law Center  
43 Broad Street, Suite 300  
Charleston, SC 29401

A handwritten signature in black ink, reading "Robert R. Smith, II". The signature is fluid and cursive, with the first name "Robert" and last name "Smith" clearly legible, followed by "II".

Robert R. Smith, II